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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SIBEL SHIPPING LTD.,

Plaintiff,

07 Civ. 11216 (LAK)
ECF CASE

-against-

KULBERG FINANCES INC.,
AGROSERVICE LTD., UKRAGROIMPEX LTD.,
and INTERBULK TRADE LLC,

**NOTICE OF MOTION TO
DISMISS FOR LACK
OF PERSONAL
JURISDICTION AND/OR
TO VACATE MARITIME
ATTACHMENT**

Defendants.
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, together with the annexed Declaration of Michael O. Hardison and the Declaration of Bulend Ipek,, and all pleadings had herein, Defendant Interbulk Trade LLC ("Interbulk") will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, on a date to be determined, for an order, pursuant to the provisions Rule 12(b)(2) of the Federal Rules of Civil Procedure, dismissing the Verified Complaint of Plaintiff Sibel Shipping LTD ("Sibel") against Interbulk for lack of personal jurisdiction over Interbulk, and, or alternatively, pursuant to Supplemental rule E(4)(f) for Certain Admiralty and Maritime claims, vacating the Order for Issuance of Process of Maritime Attachment and Garnishment

against Interbulk and further vacating all Process of Maritime Attachment and Garnishment obtained and served by Sibel pursuant thereto.

PLEASE TAKE FURTHER NOTICE that, pursuant to the provisions of Rule 6.1(b) of the Local Civil Rules for the Southern and Eastern Districts of New York, answering papers, if any, must be served on the undersigned within ten (10) business days after the service of the moving papers.

Dated: New York, New York
January 15, 2008

EATON & VAN WINKLE LLP

By: /s/ Michael O. Hardison
Michael O. Hardison

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Attorneys for Defendant
Interbulk Trade LLC